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9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 HSBC BANK, USA, NATIONAL  
 ASSOCIATION, AS TRUSTEE FOR WELLS  
 12 FARGO ASSET SECURITIES CORPORATION,  
 MORTGAGE PASS-THROUGH  
 13 CERTIFICATES SERIES 2006-AR10;

14 Plaintiff,

15 vs.

16 LVDG, LLC, a Nevada limited liability  
 company, a/k/a LVDG, LLC SERIES 108;  
 17 BELLA VISTA CONDOMINIUM UNIT  
 OWNERS ASSOCIATION, INC.; a Nevada  
 18 non-profit corporation; ALESSI & KOENIG,  
 LLC, a Nevada limited liability company;

19 Defendants.

Case No.: 2:15-cv-00750-RFB-CWH

**STIPULATION AND ORDER TO  
 TAKE DEPOSITION OF BELLA  
 VISTA CONDOMINIUM UNIT  
 OWNERS ASSOCIATION, INC.  
 AFTER DISCOVERY DEADLINE**

21 Plaintiff HSBC Bank, USA ("HSBC") together with Defendant Bella Vista Condominium  
 22 Unit Owners Association, Inc. ("HOA"), and Defendants LVDG, LLC ("LVDG") and Alessi &  
 23 Koenig, LLC ("Alessi") (jointly the "Parties"), by and through their respective counsel, hereby  
 24 stipulate and agree to allow HSBC to take the depositions of the HOA at a date and time after the  
 25 discovery deadline of February 29, 2016.

26 Pursuant to Rule 29(b), the Parties hereby agree to take the deposition of the HOA  
 27 pursuant to Rule 30(b)(6) after the discovery deadline of February 29, 2016, and conduct the  
 28 deposition on **March 3, 2016**.

The Parties have made substantial progress during the discovery period and good cause exists to grant this extension. The depositions of the other defendants will have taken place at this time and written discovery has been propounded to all Parties. Plaintiff requested and was granted an extension of time in which to respond to written discovery served by Defendant, LVDG, LLC. Pursuant to this extension, said responses are due after the close of discovery. Written discovery served by Defendant, LVDG, LLC, upon co-defendants, HOA and Alessi, also remains outstanding at this time; however, responses are due prior to the close of discovery.


Other than this deposition and as stated above, all discovery is expected to be completed within the discovery deadline of February 29, 2016. This deposition was originally scheduled for February 19, 2016 and would have been completed within the time set for discovery. However, counsel for the HOA has had a family emergency and was unable to attend the deposition on February 19, 2016. Due to the schedules of the Parties and their attorneys, the first mutually agreeable date for the deposition is **March 3, 2016**. This deposition taken after the discovery deadline will not impact the trial date or hearing date in this matter as none have yet been set.

DATED this 26<sup>th</sup> day of February 2016.

DATED this 26<sup>th</sup> day of February 2016.

SNELL & WILMER L.L.P.

ALESSI & KOENIG, LLC

By:   
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By: /s/ Chantel M. Schimming  
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*Attorneys for Defendant Defendants  
 Bella Vista Condominium Unit Owners  
 Association, Inc. and Alessi & Koenig*

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1 DATED this 26<sup>th</sup> day of February 2016.

2  
3 ROGER P. CROTEAU & ASSOCIATES,  
LTD.

4 By: /s/ Timothy Rhoda  
5 Roger P. Croteau, Esq.  
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6 Timothy Rhoda, Esq.  
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7 Las Vegas, NV 89148  
8 *Attorneys for Defendant LVDG, LLC Series*  
108

11 **ORDER**

12 **IT IS SO ORDERED.**

13  
14 DATED this 29th day of February 2016.

15  
16   
UNITED STATES MAGISTRATE JUDGE

Snell & Wilmer

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CERTIFICATE OF SERVICE

I hereby certify that on February 26, 2016, I electronically filed the foregoing with the Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system. Participants in the case as follows who have appeared and are registered CM/ECF users will be served by the CM/ECF system:

Roger P. Croteau, Esq.  
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Owners Association, Inc.  
Attorneys for Alessi & Koenig*

I further certify that the parties below have either not appeared in the case or may not be registered CM/ECF users and, therefore I have mailed the foregoing document by First-Class Mail, postage fully prepaid, to the following:

Office of the Attorney General  
555 East Washington Avenue, Suite 3900  
Las Vegas, NV 89101

DATED this 26<sup>th</sup> day of February 2016.

  
An Employee of Snell & Wilmer L.L.P.

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